

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDY HOPE WILLIAM JR., <i>Sui Juris</i>)	
<i>In Propria Persona,</i>)	
)	
Plaintiff,)	No. 21 CV 03212
)	
vs.)	Honorable Judge John F. Kness
)	
THE CITY OF AURORA, MAYOR RICHARD)	Magistrate Judge Maria Valdez
IRVIN AND CITY COUNCIL OF AURORA;)	
THE ASSOCIATION OF PROFESSIONAL)	
POLICE OFFICERS; LEE CATAVU;)	
SERGEANT TATE,)	Jury Trial Demanded
)	
Defendants.)	

**DEFENDANT CITY OF AURORA, RICHARD IRVIN AND SERGEANT JEFFREY
TATE’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Defendants, the City of Aurora, Mayor Richard Irvin and Sergeant Jeffrey Tate (collectively, the “City”), by and through their attorneys, John B. Murphey, Odelson, Sterk, Murphey, Frazier & McGrath, Ltd., move to dismiss this complaint for the following reasons:

1. The complaint in this matter consists of 200 numbered paragraphs.
2. This document is a political polemic masquerading as a lawsuit.
3. Plaintiff’s complaint is not linked to any specific allegation of City or police officer misconduct which he claims to have suffered. On the contrary, Plaintiff has another pending case, *Williams v. City of Aurora, et al*, 20 CV 02549, which is a multi-count complaint against Aurora police officers and the City arising out of a traffic ticket.
4. This complaint amounts to an abuse of the system. It should be summarily dismissed.

5. Unless ordered by the Court, the City waives the filing of an opening memorandum.

Respectfully submitted,

CITY OF AURORA, et al., Defendants

By: /s/ John B. Murphey
Their Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of said filing to all parties listed below:

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